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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

In re: SUBPOENA TO BRADLEY J.
EDWARDS:

Underlying case:

VIRGINIA L. GIUFFRE, Plaintiff

v.

GHISLAINE MAXWELL, Defendant

No. 15-cv-07433-RWS (S.D.N.Y.)

**DECLARATION OF JEFFREY S.
PAGLIUCA IN SUPPORT OF
RESPONSE IN OPPOSITION TO
BRADLEY J. EDWARDS' MOTION TO
QUASH SUBPOENA OR, IN THE
ALTERNATIVE, FOR A PROTECTIVE
ORDER**

Case Number 0:16-mc-61262-JEM

I, Jeffrey S. Pagliuca, declare as follows:

1. I am an attorney at law duly licensed in the State of Colorado and admitted to practice in the United States District Court for the Southern District of Florida, *pro hac vice*. I am a member of the law firm Haddon, Morgan and Foreman. P.C., counsel of record for

Defendant Ghislaine Maxwell (“Maxwell”) in this action. I respectfully submit this declaration in support of Maxwell’s Response to Bradley J. Edwards’ Motion to Quash Subpoena, or in the Alternative, for a Protective Order. Exhibits A, G, H, I, and N, attached to this declaration are the subject of protective orders. The sealing of the exhibits in this matter has been narrowly tailored to protect only the specific information truly deserving of protection.

2. Attached as Exhibit A (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

3. Attached as Exhibit B is a true and correct copy of “Plaintiffs and Non-Party Bradley Edwards’ “Motion for Summary Judgment on Liability” filed on November 25, 2015, in *Cassell and Edwards v. Dershowitz*, In and for the Seventeenth Judicial District, Broward County, Florida.

4. Attached as Exhibit C is a true and correct copy of the “Order Denying Petitioners’ Motion to Join”, filed in *Jane Doe #1 and #2 vs. United States*, 08-cv-80736 (S.D. Fla.), filed April 7, 2015.

5. Attached as Exhibit D is a true and correct copy of Ross Gow’s statement to the press concerning Ms. Maxwell.

6. Attached as Exhibit E is a true and correct copy of “Plaintiffs and Non-Party Bradley Edwards’ “Complaint” filed on January 6, 2015, in *Cassell and Edwards v. Dershowitz*, In and for the Seventeenth Judicial District, Broward County, Florida.

7. Attached as Exhibit F is a true and correct copy of Non-Party Virginia Giuffre's "Plaintiff's Second Amended Supplemental Response and Objections to Defendant's First Set of Discovery Requests to Plaintiff", served April 29, 2016, *Giuffre v. Maxwell*, 15-cv-07433-RWS (S.D.N.Y.).

8. Attached as Exhibit G (filed under seal) [REDACTED]

[REDACTED]

9. Attached as Exhibit H (filed under seal) [REDACTED]

[REDACTED]

10. Attached as Exhibit I (filed under seal) [REDACTED]

[REDACTED]

[REDACTED]

11. Attached as Exhibit J is a true and correct copy of the "Order Denying Intervenor's Motion for a Protective Order", filed in *Jane Doe #1 and #2 vs. United States*, 08-cv-80736 (S.D. Fla.), filed April 15, 2015.

12. Attached as Exhibit K is a true and correct copy of the "Order On the Intervenor's Motion for a Protective Confidentiality Order", filed in *Jane Doe #1 and #2 vs. United States*, 08-cv-80736 (S.D. Fla.), filed September 22, 2014.

13. Attached as Exhibit L is a true and correct copy of the "Proposed Order of Confidentiality(" Protective Order")", filed in *Jane Doe #1 and #2 vs. United States*, 08-cv-80736 (S.D. Fla.), filed May 02, 2014.

14. Attached as Exhibit M is a true and correct copy of Email correspondence from Jeffrey S. Pagliuca to Meredith Shultz dated June 20, 2016 concerning Rule 26 disclosures.

15. Attached as Exhibit N (filed under seal) [REDACTED]
[REDACTED]

16. Attached as Exhibit O is and true and correct copy of a press release concerning statements made by Paul G. Cassell and Bradley J. Edwards, dated April 8, 2016.

17. Attached as Exhibit P is a true and correct copy of the transcript hearing held before the S.D.N.Y. Court in the *Giuffre v. Maxwell*, matter on April 21, 2016.

18. Attached as Exhibit Q is a true and correct copy of the “Complaint” filed on December 7, 2009, in *Epstein v. Rothstein et. al*, In the Circuit Court of the Fifteenth Judicial Circuit In and for, Palm Beach County, Florida

19. Attached as Exhibit R is a true and correct copy of Email correspondence from Jeffrey S. Pagliuca to Bradley Edwards dated May 20, 2016 regarding service of Subpoena Duces Tecum for Mr. Edwards.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 30, 2016 in Denver, Colorado.

By: /s/ Jeffrey S. Pagliuca
Jeffrey S. Pagliuca

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2016, I electronically filed the foregoing *Declaration of Jeffrey S. Pagliuca In Support of Response In Opposition to Bradley J. Edwards' Motion to Quash Subpoena or, in the Alternative, for a Protective Order* with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

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